

EXHIBIT 2

From: Knudson, Jacquelyn Swanner
Sent: Tuesday, May 5, 2020 8:43 PM
To: Scott Markowitz
Cc: McClammy, James I.; Oluwole, Chautney M.; Jonilda Seitllari
Subject: RE: [EXT] RE: In re Purdue Pharma, L.P. et al., No. 19-23649 (Bankr. S.D.N.Y.) – Bankruptcy Rule 2004 - Meet and Confer Request

Scott—

These documents were produced to the data room.

Thanks,
Jacquelyn

Jacquelyn Swanner Knudson

Davis Polk & Wardwell LLP

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jacquelyn.swanner@davispolk.com

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From: Scott Markowitz <SMarkowitz@tarterkrinsky.com>
Sent: Tuesday, May 5, 2020 7:23 PM
To: Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>
Cc: McClammy, James I. <james.mcclammy@davispolk.com>; Oluwole, Chautney M. <chautney.oluwole@davispolk.com>; Jonilda Seitllari <jseitllari@tarterkrinsky.com>
Subject: Re: [EXT] RE: In re Purdue Pharma, L.P. et al., No. 19-23649 (Bankr. S.D.N.Y.) – Bankruptcy Rule 2004 - Meet and Confer Request

Hi Jacquelyn, your production references that extra copies of bates stamped docs from a prior production is included but I did not see that . Can you pleas send ?



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On Apr 24, 2020, at 5:01 PM, Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com> wrote:

Scott—

Please find below our responses to your interrogatories and requests for production:

Response to Interrogatories 1-5 and Requests for Production 1, 4

In the MDL, Interrogatory No. 2 requested Purdue identify *all* Scientific research, studies, tests, trials or analysis that it relied on to test or market the safety and efficacy of its opioid medications. In its supplemental response on October 5, 2018, Purdue identified the bates ranges where such documents could be found in its New Drug Application (“NDA”) files for OxyContin, Hysingla ER, and Butrans. Then on March 4, 2019, Purdue further supplemented its response with a list of studies and clinical trials that it was able to identify that relate to safety and efficacy. The list includes bates numbers where they can be found in Purdue’s document production. Further, in its March 4 supplement, Purdue responded to Interrogatory No. 29 that asked it to identify all scientific research on which it relied for marketing statements related to eight different topics. Purdue provided that list by category and again with bates numbers and/or sufficient identifying information for the requesting party to obtain the study. The information sought by the interrogatory – title, date, investigators/authors, financial support, and FDA submission – is contained within the studies themselves or the NDA files.

The NDA files and Adverse Event Reports also include clinical observations of in utero exposure, if any, to the compounds under study. The Adverse Event Reports were produced in the MDL at PPLP004385541 through PPLP004390686. Information responsive to this request would also be included in the MedWatch Reports, which are reports that reflect relevant adverse events, but do not contain enough information to create formal Adverse Event Reports, and product complaints.

The NDA file also contains all of the company’s FDA submissions, which would include as applicable, submissions related to licensing and approvals of Purdue’s opioid medications.

As stated, information from these responses as well as the underlying and cited documents were all provided in the MDL, but for your easy reference, today’s production will include extra copies of the MDL discovery responses. The Bates range for these documents is PPLPCNC500588670 through PPLPCNC500589138.

Response to Request for Production 2

This request is extremely broad in that it calls for essentially every document that mentions any of the studies identified in the interrogatories mentioned above. Given the large number of studies, the request is not feasible. However, with the information provided by Purdue in the above-referenced responses, you can review any study, identify those of interest, and then conduct searches to find any related documents using the titles, authors, cites, and/or key words. This can be done in addition to reviewing the materials related to the studies in the NDA files also identified in the above interrogatory responses.

Response to Request for Production 3

As you know, the search terms used for document discovery that you’ve had from the MDL were extremely broad and used by agreement of plaintiffs. The searches included broad terms, such as “opioid” and “OxyContin,” among others. To the extent the additional terms that you list relate to opioids, the documents would be subsumed within the searches that were agreed upon and run.

Once you have had a chance to review, please let us know if a call to discuss would be helpful.

Best,
Jacquelyn

Jacquelyn Swanner Knudson

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From: Scott Markowitz <SMarkowitz@tarterkrinsky.com>
Sent: Monday, April 20, 2020 10:34 AM
To: Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>
Cc: McClammy, James I. <james.mcclammy@davispolk.com>; Oluwole, Chautney M. <chautney.oluwole@davispolk.com>; Jonilda Seitllari <Jseitllari@tarterkrinsky.com>
Subject: Re: [EXT] RE: In re Purdue Pharma, L.P. et al., No. 19-23649 (Bankr. S.D.N.Y.) – Bankruptcy Rule 2004 - Meet and Confer Request

Ok thank you

<image001.png>

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On Apr 20, 2020, at 10:19 AM, Knudson, Jacquelyn Swanner
<jacquelyn.swanner@davispolk.com> wrote:

Hi Scott,

3 p.m. on Tuesday works. I will send a calendar invite and dial-in shortly.

Thanks,
Jacquelyn

Jacquelyn Swanner Knudson

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From: Scott Markowitz <SMarkowitz@tarterkrinsky.com>
Sent: Friday, April 17, 2020 8:18 PM
To: Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>
Cc: McClammy, James I. <james.mcclammy@davispolk.com>; Oluwole, Chautney M. <chautney.oluwole@davispolk.com>; Jonilda Seitllari <jseitllari@tarterkrinsky.com>
Subject: Re: [EXT] RE: In re Purdue Pharma, L.P. et al., No. 19-23649 (Bankr. S.D.N.Y.) – Bankruptcy Rule 2004 - Meet and Confer Request

Hi, does 3 pm est work ?

<image001.png> **Scott Markowitz | Partner**
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On Apr 17, 2020, at 5:40 PM, Knudson, Jacquelyn Swanner
<jacquelyn.swanner@davispolk.com> wrote:

Thank you, Jonilda. Adding our colleague, Chautney.

Scott, please let us know your availability for call on Tuesday. We would appreciate the opportunity to discuss this with you before you file your motion.

Best,
Jacquelyn

Jacquelyn Swanner Knudson

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From: Jonilda Seitllari <jseitllari@tarterkrinsky.com>
Sent: Friday, April 17, 2020 4:58 PM
To: McClammy, James I. <james.mcclammy@davispolk.com>; Knudson, Jacquelyn Swanner <jacquelyn.swanner@davispolk.com>
Cc: Scott Markowitz <SMarkowitz@tarterkrinsky.com>
Subject: Re: In re Purdue Pharma, L.P. et al., No. 19-23649 (Bankr. S.D.N.Y.) – Bankruptcy Rule 2004 - Meet and Confer Request

Good Afternoon:

Attached please find letter correspondence from Scott S. Markowitz and Rule 2004 Motion regarding the above-referenced chapter 11 case.

Thank you
Jonilda Seitllari

<[image001.png](#)>

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